

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

MOTORS LIQUIDATION COMPANY *et al.*,
f/k/a GENERAL MOTORS CORP. *et al.*,
Debtors.

Chapter 11

Case No. 09-50026 (REG)

(Jointly Administered)

DECLARATION OF ROBERT NUNES

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Southern District of New York
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NATALIE N. KUEHLER
DAVID S. JONES
Assistant United States Attorneys
– Of Counsel –

Robert Nunes, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury as follows:

1. I am a Remedial Project Manager in the Emergency and Remedial Response Division of the United States Environmental Protection Agency (“EPA”), Region 2, 290 Broadway, New York, New York 10007.
2. I have been with the Emergency and Remedial Response Division since 1989.
3. I received a Bachelors of Science in meteorology from Florida State University in 1981. I received a Master’s of Science in Applied Science from New York University in 1985.
4. As part of my official duties as the Remedial Project Manager for the Lake Bottom subsite of the Onondaga Lake Superfund Site in Onondaga County, New York, I developed an estimate of the cost of EPA’s oversight of the remedy at this subsite for the purposes of this bankruptcy. A record of decision (“ROD”) was issued for this subsite in 2005 and it was estimated that the remedy selected had a present worth cost of \$451 million. EPA, as the support agency at this subsite, estimates that its oversight of the remedy will be 1% of the total cost of the remedy, or \$4.5 million.
5. At the time the settlement amounts were negotiated, EPA’s unreimbursed past costs at this subsite were \$1,345,968.
6. Based on available information and for the purpose of resolving EPA’s claims in this bankruptcy, I estimated that Motors Liquidation Corporation (“MLC”) may be liable for 7.5% of the costs EPA has incurred and will incur at the Lake Bottom subsite by considering that portion of Onondaga Lake which is being remediated and which may have been impacted by MLC-related contaminants. Thus, in applying the 7.5%, I estimated that MLC may be liable for the \$100,948 of EPA’s past costs and \$337,500 of EPA’s future costs at the Lake Bottom

subsite.

I declare under the penalty of perjury that the above is true and correct.

Executed June 13, 2012, in New York, NY

A handwritten signature in black ink, appearing to read "Robert Nunes". The signature is somewhat fluid and cursive, with "Robert" on top and "Nunes" below it.

Robert Nunes